

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Robert Allen Conte
Debtor 1

Chapter 13

Case No. 1:22-BK-01353-HWV

Matter: Motion for Termination of Wage Attachment Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Robert Allen Conte, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about July 22, 2022.
- 2) Debtor 1 previously received regular income from employment with Commonwealth of Pennsylvania which had been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment as Debtor 1 has gained employment elsewhere.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: August 20, 2025

/s/ Robert Allen Conte

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS
HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 previously received income
should immediately cease the wage attachment in the amount of **\$280.62** from each **bi-weekly** paycheck.

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, August 20, 2025, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Commonwealth of Pennsylvania
Bureau of Payroll Operations
PO Box 8006
Harrisburg, PA 17106-8006

Via Electronic Means
Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo US Courthouse
1501 North Sixth Street, 3rd Floor
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire